

REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) Heidi Brown-Polk Case No. 19-02277 Chapter 13
Select Portfolio Servicing, Inc. as servicing agent for
Deutsche Bank National Trust Company, as
Trustee in trust for registered Holders of Long Beach
Mortgage Loan Trust 2006-WL2, Asset-Backed
Certificates, Series 2006-WL2

All Cases: Moving Creditor Date Case Filed 01/27/2019

Nature of Relief Sought: Lift Stay Annul Stay Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ Or Date Plan Confirmed 06/17/2019

Chapter 7: No-Asset Report Filed on _____
 No-Asset Report not filed, Date of Creditors Meeting _____

1. Collateral

a. Home
b. Car Year, Make, and Model _____
c. Other (describe) _____

2. Balanced Owed as of October 18, 2019 \$333,370.66, principal balance, \$386,446.97 payoff balance
Total of all other Liens against Collateral \$

3. In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and
dates of all payments received from the debtor(s) post-petition:
Attached as Exhibit E

4. Estimated Value of Collateral (must be supplied in *all* cases) \$250,000.00 based on debtor schedule A/B

5. Default

a. Pre-Petition Default
Number of months _____ Amount \$ _____
b. Post-Petition Default
i. On direct payments to the moving creditor
Number of months 9 Amount \$12,920.85
ii. On payments to the Standing Chapter 13 Trustee
Number of Months _____ Amount \$ through _____

6. Other Allegations

a. Lack of Adequate Protection § 362(d)(1)
i. No insurance
ii. Taxes unpaid Amount \$ _____
iii. Rapidly depreciating asset
iv. Other (describe) _____

b. No Equity and not Necessary for an Effective reorganization § 362(d)(2)

c. Other “Cause” § 362(d)(1)
i. Bad Faith (describe) _____
ii. Multiple Filings _____
iii. Other (describe) _____

d. Debtor’s Statement of Intention regarding the Collateral
i. Reaffirm ii. Redeem iii. Surrender iv. No Statement of Intention Filed

Date: 10/30/2019 /s/ Josephine J. Miceli
Counsel for Movant